



April 30, 1999

EX PARTE

Ms. Magalie Roman Salas  
Secretary – Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: CC Docket Nos. 96-45 and 97-160 ✓

Dear Ms. Salas:

The enclosed letter is a copy of a letter submitted to Craig Brown of the Common Carrier Bureau's Accounting Policy Division as a carbon copy. The letter is PNR and Associates response to Thomas Mitchell's, of Collier, Shannon, Rill & Scott, letter to PNR and Associates on GTE's behalf.

The original and three copies of this letter are being submitted to the Secretary of the FCC in accordance with Section 1.11206(b)(1) of the Commission's rules. If there are any questions please call PNR at (215) 886-9200.

Sincerely,

Charles A. White  
Product Manager  
Telecommunications

Enclosure



April 29, 1999

VIA FACSIMILE AND MAIL

Thomas W. Mitchell  
Collier, Shannon, Rill & Scott  
3050 K Street, N.W.  
Washington, DC 20007

Dear Mr. Mitchell:

As per your request, I am writing to clarify and summarize the position(s) of PNR and Associates regarding the issues raised in our April 16, 1999 telephone call. Overall, PNR recognizes GTE's desire to understand and evaluate the data that is used in the development of the HCPM input data, but PNR does not recognize GTE's need to have off-site possession of the data to complete this evaluation. Further, given the complex nature of much of the data and methodologies involved, PNR believes that the data is best understood when presented by our staff. As expressed in our April 16, 1999 telephone conversation, PNR strongly believes in accommodating the needs of all parties with interest in evaluating the HCPM input data to the best of our ability.

I have outlined PNR's position regarding the data requested by GTE below:

**Customer location points (a.k.a. geocoded database):** PNR will allow access to the geocoded customer location points through a supervised visit to PNR's Jenkintown, PA location. The reasons for this decision are threefold:

- 1) The data is entitled to confidential treatment by the FCC and parties participating in FCC proceedings, as it is both proprietary and commercially valuable to PNR. Thus, PNR must maintain control of the data in order to protect internal business interests.
- 2) As noted in your April 22, 1999 letter, PNR uses third-party databases in the creation of the input data and as such, PNR is not permitted to allow outside parties control or rights to obtain the data based on contractual obligations.
- 3) PNR has filed affidavits in state regulatory proceedings echoing our position regarding access to customer location inputs. PNR cited that under no circumstances can PNR allow a party control or right to obtain the data in question.

**"Models and Algorithms:"** Your April 22, 1999 requests that PNR "... make available all models and algorithms that are employed to create the geocoded database, including the National Access Line Model (NALM)." As we expressed in the telephone conversation of April 16, 1999, this request is ambiguous in nature. In regard to the NALM, PNR *will* allow GTE to discuss and review the process used in creating the NALM at our Jenkintown, PA location. There is no practical alternative to on-site review of this process.

As expressed previously, PNR believes that for GTE to fully understand the HCPM input data, and the methodologies involved in its creation, a professional and mutually cooperative relationship is necessary. We will work with GTE to help GTE better understand the data requested.

In summary, PNR continues to make all data involved in the creation of the HCPM input data available to GTE through an on-site review at our Jenkintown, PA location. Further, PNR believes that the on-site review process will allow GTE a greater understanding of much of the data involved when compared with any off-site alternatives. We look forward to continuing to discuss these issues with you and GTE. Please call me at (215) 886-9196 with any questions or concerns.

Sincerely,



Charles A. White  
Product Manager  
Telecommunications

cc: Craig Brown, Federal Communications Commission  
Laura Kwartler, INDETEC International, General Counsel  
William Newman, PNR and Associates, Vice President